

Lisa A. Marcy (#5311)
lmarcy@clydesnow.com
CLYDE SNOW & SESSIONS, P.C.
201 South Main Street, 13th Floor
Salt Lake City, Utah 84111
Telephone: 801-322-2516

John K. Johnson (#3815)
Jkjohnson1080@hotmail.com
JOHN K. JOHNSON, LLC
10 West 300 South, Suite 800
Salt Lake City, Utah 84101
Telephone: 801-915-2616

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

JOSHUA CHATWIN,

Plaintiff,

v.

DRAPER CITY; DRAPER CITY POLICE
DEPARTMENT; POLICE CHIEF MAC
CONNOLE; OFFICER J. PATTERSON, in
his individual and official capacity; OFFICER
DAVID HARRIS, in his individual and
official capacity; OFFICER HEATHER
BAUGH, in her individual and official
capacity; and JOHN DOES 1-10,

Defendants.

REPORT OF EXPERT WITNESS
KIRK TORGENSEN

Civil No. 2:14-cv-375
Judge Dale A. Kimball

Plaintiff Joshua Chatwin hereby submits the attached Expert Report of Kirk Torgensen as
required by the Court's Scheduling Order entered December 10, 2014, and Rule 26(a)(2)(B),
Federal Rules of Civil Procedure.

The Expert Report attached hereto as Exhibit A addresses the items required pursuant to subsections (i), (ii), (iv), (v) and (vi) of Rule 26(a)(2)(B). Furthermore, the undersigned counsel is authorized to state on behalf of Mr. Torgensen that he has not authored any publications in the previous ten years, nor has he testified at trial or by deposition in the previous four years. Mr. Torgensen's bill to conduct his analysis on any training, policies and procedures of Defendants on the use of force by Draper City police officers on arrestees and to prepare Exhibit A attached hereto was \$3,900. Mr. Torgensen will be compensated for further work on this matter at the rate of \$350 per hour.

DATED this 15th day of January 2016.

CLYDE SNOW & SESSIONS

/s/ Lisa A. Marcy

Lisa A. Marcy

Attorneys for Plaintiff Joshua Chatwin

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of January 2016, I caused a true and accurate copy of the foregoing Report of Expert Witness Kirk Torgensen to be filed via the Court's ECF system, which in turn sent copies to counsel of record in accordance with the Court's protocols.

/s/ Michelle Carter